

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI
FILED

ORPHEUS LENSON

APR 28 2022

PLAINTIFF

VS.

ZACK WALLACE, CIRCUIT CLERK

CIVIL ACTION NO. 22-253

BY

D.C.

PRECISION DESIGN MACHINERY, INC.
d/b/a ADI/PDM TRADE GROUP and
DEFENDANTS A - Z

DEFENDANTS

COMPLAINT

(JURY TRIAL DEMANDED)

Plaintiff, Orpheus Lenson, files this his Complaint against Precision Design Machinery, Inc. d/b/a ADI/PDM Trade Group and Defendants A - Z, as follows:

I.

The Plaintiff is an adult resident citizen of Hinds County, Mississippi who resides at 121 South Green Avenue, Jackson, Mississippi 39203.

II.

Defendant Precision Design Machinery, Inc. d/b/a ADI/PDM Trade Group ("ADI/PDM") is a company organized and existing under the laws of the State of North Carolina which may be served with process of this Court by service on its registered agent, Joseph C. White, 106 Apollo Circle, Arendale, NC 27263 and by service upon its President, Chad Butler R. Butler, Jr., at its main office located at 1509 Bethel Drive, High Pointe, NC 27260.

III.

Defendants A - Z are individuals and/or entities whose identities are currently unknown. When their true identities have been disclosed, the pleadings will be amended to reflect their true identities.



IV.

On May 2, 2019, the Plaintiff was working at Great Southern Industries, Inc., 1320 Bowling Street, Jackson, Mississippi 39209, in the First Judicial District of Hinds County, Mississippi when his hand was caught in a piece of machinery designed, manufactured and installed by ADI/PDM. Defendants A – Z participated in the installation and instructions regarding the machinery.

V.

The above machine was unreasonably dangerous and unsafe because of lack of proper guarding, design, and instructions which allowed Plaintiff's hand to get caught in the machine. The Defendants are guilty of negligence, breach of contract, breach of implied and expressed warranties. The Defendants are also liable to the Plaintiff under the theory of strict liability in tort as a result of the dangerous and unreasonably unsafe condition of the machinery.

VI.

As a result of the Defendants' failures as set out in the previous paragraphs, Plaintiff sustained severe painful and permanent personal injuries which caused him to suffer physical pain, suffering, disability, disfigurement and mental suffering and anxiety in the past and on a permanent basis. In an effort to treat his injuries, medical bills have been incurred on behalf of the Plaintiff.

WHEREFORE, PREMISES CONSIDERED Plaintiff Orpheus Lenson files this his civil action against the Defendants and demands a judgment against the Defendants in an amount sufficient to compensate him for his personal injuries together with pre and post-judgment interests and all costs of the Court herein.

DATED this the 20 day of April, 2022.

Respectfully submitted,

ORPHEUS LENSON

BY:

Joseph E. Roberts, Jr.

OF COUNSEL:

Joseph E. Roberts, Jr. (MSB #5587)
Pittman, Roberts & Welsh, PLLC
410 South President Street (39201)
Post Office Box 22985
Jackson, Mississippi 39225-2985
Telephone: 601.948.6200
Facsimile: 601.948-6187
Email: jer@prwlaw.com

T. Mark Sledge (MSB # 6842)
Attorney at Law, PLLC
587 Highland Colony Parkway
Ridgeland, Mississippi 39157
Telephone:
Facsimile:
Email: mark@sledgelawfirm.com